

**TORRES | TORRES STALLINGS  
A LAW CORPORATION**

David. A. Torres, SBN 135059  
1318 K. Street  
Bakersfield, CA 93301  
Tel: (661)326-0857  
Email: dtorres@lawtorres.com

Attorney for:  
ARTURO FARIAS-ZEPEDA

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ARTURO FARIAS ZEPEDA,

Defendant

) Case No.: 1:22-CR-00297 JLT-BAM

)  
) **DEFENDANT ARTURO FARIAS**  
) **ZEPEDA'S SENTENCING**  
) **MEMORANDUM**

) Date: August 18, 2025

) Time: 9:00am

) Courtroom: 4

) **HONORABLE JENNIFER L. THURSTON**

1 **I. INTRODUCTION**

2 In the instant case, U.S. Probation has Mr. Farias with an OL of 37 and CHC of I. The range  
3 is 210-262 months. The government is seeking a recommendation for the low-end 210 months.  
4 In his plea agreement, Mr. Farias retained the ability to ask this court to consider a sentence  
5 which is reasonable considering his lack of criminal history and family responsibilities.  
6

7 **II. RESPONSE TO OBJECTIONS**

8 Having reviewed the responses of both USPO Ross Micheli (Doc.192-2) and AUSA Antonio  
9 Pataca (Doc. 207), the defense is prepared to submit this issue as to issue concerning *role* to the  
10 court.  
11

12 **III. ARTURO FARIAS-ZEPEDA**  
13 **REQUESTS THIS COURT IMPOSE A SENTENCE THAT IS SUFFICIENT, BUT**  
14 **NOT GREATER THAN NECESSARY, TO COMPLY WITH THE OBJECTIVES SET**  
15 **FORTH IN 18 USC §3553(A)**

16 This case highlights the deeply unfortunate circumstances surrounding 41-year-old  
17 Arturo Farias. He is a dedicated father and husband. Mr. Farias' arrest has deeply impacted his  
18 family, and he feels significant remorse that his actions have in effect destroyed his family unity.  
19 He informed probation his wife is depressed and stressed, and she had to start working after his  
20 arrest. He also reported his oldest son intended to enlist in the United States Army, however,  
21 after Farias' arrest, his son sought local employment to lend financial support for the family. Mr.  
22 Farias informed USPO Micheli that he feels "destroyed" and he has "lots of regrets." (PSIR, ¶  
23 38). The undersigned spoke with Mr. Farias telephonically on August 11<sup>th</sup> to review AUSA  
24 Antonio Pataca's Objections and Sentencing Memorandum. (Doc.207) Mr. Farias reiterated his  
25 regret for his involvement in such a repulsive crime.

1 The underlying facts which led to Mr. Farias' criminal conduct are egregious.  
2 Regrettably, like many individuals nationwide, the Covid epidemic affected the livelihood of  
3 families. Unfortunately, some resorted to criminal activity. The question of proper import,  
4 however, is whether a 210-month period is an appropriate sentence for a person with no prior  
5 criminal history and a young family to provide for. The defense believes a lesser sentence is  
6 appropriate and believes the prison time served will deter Mr. Farias from future criminal  
7 conduct.

8  
9 **1. 18 USC §3553(a) Factors**

10 As noted, Mr. Farias is 41 years of age, has no prior criminal history and has supported  
11 his family.

12 **2. Nature and circumstances of the offense.**

13 Mr. Farias is cognizant of the nature and severity of his conduct. Moreover, he is  
14 reminded daily of the impact and consequences his actions have had on his life and family.  
15 Although Mr. Farias will be deported to Mexico upon serving his sentence, he is not the type of  
16 person who will ever come before this court again. While on pre-trial service release, his  
17 performance has been incredibly positive. In the PSIR, AUSA Micheli noted, "On December 6,  
18 2023, Farias-Zepeda successfully completed the location monitoring program, and the condition  
19 was removed by the Court. Farias-Zepeda has maintained a stable residence and has had no new  
20 law violations while under supervision, nor has he demonstrated any non-compliance with his  
21 conditions of release. He has also maintained regular contact with Pretrial Services. He is always  
22 cordial and responsive to Pretrial Services, and he has been very cooperative throughout his  
23 supervision period. His overall compliance with the conditions of release has been satisfactory."  
(PSIR, ¶ 4)

24 Of course, Mr. Farias is required to be in his best behavior to remain in compliance with  
25 PTS and the court's orders, but nevertheless, his courteous, kind, and modest demeanor is the  
type of person Mr. Farias happens to be daily. Unfortunately, he was caught up with the need to

1 sustain his family, combined with the greed and disregard necessary to sell narcotics. Despite his  
2 temporary unfortunate venture, he is contrite for his misguided conduct.

### 3 **3. History and characteristics of the defendant**

4 Mr. Farias has reached rock bottom. With a 120-month mandatory minimum sentence,  
5 Farias will spend the next decade apart from his family. Farias will no less reflect daily on the  
6 incident which led him to his monotonous life in a prison cell. Suffice it to say, this incident will  
7 deter Mr. Farias from engaging in similar conduct.

### 8 **4. Need for the sentence to reflect the seriousness of the crime.**

9 Any sentence will have severe consequences upon Mr. Farias' family and himself. It is  
10 true, his conduct in committing the offense was a serious breach of the law. However, the  
11 positive step he has taken in accepting responsibility for this crime should be given  
12 consideration.

### 13 **5. To afford adequate deterrence to criminal conduct**

14 The guideline range is 210-262 months with a recommendation of 210 months. The  
15 defense is seeking a significant variance in sentencing. The defense believes the circumstances  
16 noted in section III, and Mr. Farias' remorse, lack of criminal history, family ties and  
17 responsibilities, relatively young age, and community ties with his local Catholic church should  
18 be given substantial consideration. This was quite a devastating and humiliating experience for  
19 Mr. Farias; however, a tremendous lesson learned in avoiding all criminal conduct in the future.

## 20 **CONCLUSION**

21 Any sentence imposed by the court is a significant period of incarceration for a person  
22 with no criminal background, work history, and ties to the community in which he resides. Mr.  
23 Farias has displayed overwhelming remorse for his actions. He is deeply saddened by his  
24 conduct and will use this tremendous sense of guilt as a guide to ensure that he never violates the  
25 law again.

1 Respectfully Submitted,

2 DATED: August 13, 2025

*/s/ David A. Torres*

DAVID A. TORRES  
Attorney for Defendant  
Arturo Farias Zepeda